

1 **KATHLEEN A. LEAVITT**
2 **CHAPTER 13 BANKRUPTCY TRUSTEE**
3 **201 Las Vegas Blvd South, Suite 200**
4 **Las Vegas, NV 89101**
5 **kal13mail@las13.com**
6 **(702) 853-0700**

E-File: 08/11/2011

4 **UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA**

5
6 **IN RE:**

Chapter 13
BKS-09-31937-BTB

7 **RICHARD K MANNIS**
8 **CAROL S KOHN-MANNIS**

MOTION TO DISMISS

MOTION TO DISMISS

Hearing Date: October 20, 2011

Hearing Time: 2:00 pm

9 Debtor(s).

10 Comes now KATHLEEN A. LEAVITT, Chapter 13 Bankruptcy Trustee in the above captioned
11 bankruptcy case and for her motion states and alleges as follows:

12 1. Debtor(s) filed an Original Petition under Chapter 13, Title 11 of the United States Code
on November 20, 2009.

13 2. Chapter 13 Plan was confirmed by the Court on 02/11/2010.

14 3. Balance on hand at the time of filing this motion is \$1,143.07.

15 4. The Trustee requests that this case be dismissed pursuant to 11 U.S.C. § 1307 (c) for one
or more of the following reasons, to wit:

(c) For cause,

(c)(6) Material default by the debtor with respect to a term of a confirmed plan to wit:

- Other: Failure to turn over a copy of the 2010 tax return and tax refund, if any.

17 WHEREFORE, the Trustee prays the Court issue an order dismissing the within case for the
18 reasons as stated above and that expenses in the amount of \$0.00 be allowed in this case.

19
20 /s/ KATHLEEN A LEAVITT

21 DATED: 8/11/2011
22 TPS

Kathleen A. Leavitt
CHAPTER 13 BANKRUPTCY